

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

ARTIS WHITEHEAD)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:24-CV-02991
)	JURY DEMAND
CITY OF MEMPHIS, JAMES HOWELL,)	
TERRY LYONS, ROBERT RAGLAND,)	
JOSEPH PEARLMAN, VIVIAN MURRAY,)	
THOMAS WARRICK, TIMOTHY GREEN,)	
EDWARD BASS, ROBERT HULL, JR.,)	
JAMES BOLDEN, and UNKNOWN)	
EMPLOYEES OF THE CITY OF MEMPHIS,)	
)	
Defendants.)	

**DEFENDANT THE CITY OF MEMPHIS' MOTION TO DISMISS FOR FAILURE TO
STATE A CLAIM**

Defendant the City of Memphis (“the City”), pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby moves to dismiss Plaintiff Artis Whitehead’s Complaint for failure to state a claim upon which relief can be granted. In support of its Motion, the City relies on its accompanying Memorandum in Support.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Bruce McMullen

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*Attorneys for Defendant City of Memphis
and Defendants Thomas Warrick, James
Howell and Robert Ragland*

CERTIFICATE OF SERVICE

I, Bruce McMullen, hereby certify that on March 6, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing upon all counsel of record in this action.

s/ Bruce McMullen
Bruce McMullen